

JONES DAY  
Rick Bergstrom, Bar No. 169594  
rjbergstrom@jonesday.com  
Jayce E. Gustafson, Bar No. 344961  
jgustafson@jonesday.com  
4655 Executive Drive  
Suite 1500  
San Diego, California 92121.3134  
Telephone: +1.858.314.1200  
Facsimile: +1.844.345.3178

Attorneys for Defendant  
MICRON TECHNOLOGY INC.

KING & SIEGEL LLP  
Julian Burns King, Bar No. 298617  
julian@kingsiegel.com  
Robert J. King, Bar No. 302545  
robert@kingsiegel.com  
Erum Siddiqui, Bar No. 325981  
erum@kingsiegel.com  
724 S. Spring Street, Suite 201  
Los Angeles, CA 90014  
Telephone: +1.213.465.4802  
Facsimile: +1.213.465.4803

Attorneys for Plaintiff ROBERT BIELBY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ROBERT BIELBY, an individual;  
  
Plaintiff,  
  
v.  
  
MICRON TECHNOLOGY INC., a  
Delaware corporation; and Does 1-10,  
inclusive;  
  
Defendants.

Case No. 2:23-cv-2356-KJM-CKD

**STIPULATION AND ORDER TO  
ELECT REFERRAL OF ACTION  
TO VOLUNTARY DISPUTE  
RESOLUTION PROGRAM  
(VDRP) PURSUANT TO LOCAL  
RULE 271**

1 Pursuant to Local Rule 271, the Parties hereby agree to submit the above-  
2 entitled action to the Voluntary Dispute Resolution Program (“VDRP”). The  
3 Parties request that the VDRP proceeding be scheduled in 2025 after the ruling on  
4 defendant Micron Technology Inc.’s Summary Judgment Motion which the parties  
5 currently anticipate will occur by the end of 2024.

6  
7 Dated: July 31, 2024

JONES DAY

8  
9 By: s/ Rick Bergstrom  
Rick Bergstrom

10 Attorneys for Defendant MICRON  
11 TECHNOLOGY INC.

12 Dated: July 31, 2024

KING & SIEGEL LLP

13  
14 By: s/ Erum Siddiqui (as authorized on  
15 7/31/24)  
Erum Siddiqui

16 Attorneys for Plaintiff ROBERT  
17 BIELBY

**ORDER**

Pursuant to the parties' stipulation, the court refers this matter to the court's ADR Coordinator, Sujean Park, for referral to the Voluntary Dispute Resolution Program (VDRP). The court request that Ms. Park ascertain if the parties are prepared to attend a VDRP session before dispositive motion briefing, and if so that she arrange for such a session this year yet. If not, the VDRP session shall be scheduled no later than 2025 as the parties request and shall occur by June 30, 2025. At the session, a principal with full settlement authority for each party shall appear.

IT IS SO ORDERED.

DATED: August 4, 2024



---

CHIEF UNITED STATES DISTRICT JUDGE